

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: February 22, 2024 at 1:00 P.M. ET

Objection Deadline: February 9, 2024 at 4:00 P.M. ET

Ref. Nos. 6280 & 6285

**CERTIFICATION OF COUNSEL REGARDING
DEBTORS' NINTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION
TO CERTAIN SUPERSEDED CLAIMS (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On January 23, 2024, the Debtors filed the *Debtors’ Ninth (Non-Substantive) Omnibus Objection to Certain Superseded Claims (Customer Claims)* [D.I. 6280, redacted & 6285, sealed] (the “Objection”).

2. Pursuant to the *Notice of Objection* attached to the Objection [D.I. 6280-1 & 6285-1], any responses to the Objection were to be filed no later than February 9, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

3. On February 6, 2024, Zixuan Xu filed a response to the Objection [D.I. 7076] (the “Xu Response”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

4. On February 9, 2024, MAX NICE INDUSTRIES LIMITED (“MAX NICE”) filed a response to the Objection [D.I. 7195] (the “MAX NICE Response”).

5. As of the date hereof, no other formal objections or other responses to the Objection have been filed or served on the Debtors, besides the Xu Response and the MAX NICE Response (collectively, the “Responses”).

6. The Debtors have resolved the MAX NICE Response with no changes to the proposed form of order attached to the Objection (the “Proposed Order”).

7. Based on the Debtors’ review of the Xu Response, the Debtors are withdrawing the Objection solely with regard to Zixuan Xu’s claim without prejudice and with all rights of the parties reserved with regard thereto.

8. The Debtors have revised the Proposed Order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the withdrawal. A copy of the Revised Order compared against the Proposed Order is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Office of the United States Trustee (the “U.S. Trustee”) and the Official Committee of Unsecured Creditors (the “Committee”), who have confirmed that they have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

9. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: February 22, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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